

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
(Alexandria Division)

ROBERT WHITLEY,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:20-cv-1411 (RDA/TCB)
)	
SECTEK, INC.)	
)	
Defendant.)	

PLAINTIFF'S CONTESTED JURY
INSTRUCTIONS (WITH CITATIONS)

Pursuant to the Court's pre-trial order dated February 22, 2022 (ECF 36), Robert Whitley proposes the following special instructions for use at trial that are opposed by defendant SecTek, Inc.

Plaintiff's instructions to which defendant as agreed are presented in the parties' joint instructions.

Respectfully submitted,

ROBERT WHITLEY,

By counsel

Dated: March 31, 2022

Counsel for Plaintiff:

//s// Victor M. Glasberg

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WhitleyRobert\SecTek\Trial\JuryInstructions\2022-0331-PIEJContestedJuryInstructions(W/Citations)

Certificate of Service

I, Victor M. Glasberg, hereby certify that on this 31st day of March 2022, I electronically filed the foregoing Plaintiff's Contested Jury Instructions With Citations with the clerk of the court.

//s// Victor M. Glasberg
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